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July 20, 2008

The Honorable Gerard E. Lynch, USDJ
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

RE: USA v. Linda Duh and Tony Duh 7-Cr-511 (GEL)

Dear Judge Lynch:

Please accept this submission in support of the defendants Linda and Tony Duh, respectively. The undersigned counsel, Messrs. S. Michael Musa-Obregon, and Telesforo Del Valle, Jr. file this joint submission for their respectively clients, Tony Duh and Linda Duh, respectively.

It is our hope that by this joint submission Your Honor may obtain a full sense of this couple and their background, and by extension their family, but more importantly, the manner in which the crimes charged herein occurred. We wish that by this joint submission, the Court may better evaluate the underlying conduct in its multidimensional historical context, and exercise its mercy and compassion on this husband and wife couple, who had always hitherto lived exemplary lives as decent, extremely hardworking, uniquely productive, relatively recent immigrants to the United States.

In this joint submission, we attach the following documents:

- a) A pictorial report of the import-export business which the Duh family owns and operates in its full context, depicting the interior and exterior part of the stores, samples of their inventory and stock, samples of the accounting system utilized by the Duh's in documenting all of the revenue received, pictures of some of their major Latin American customers' warehouses in South America which the Duh family visited during several trips, and various other physical and visual aspects of the business useful for gaining an understanding of this family business.

- b) A forensic psychological report of Anthony Duh, the son of Tony and Linda Duh, by Dr. Juan Carlos Dumas, a psychotherapist who has treated and tested Anthony, indicating that the sixteen year old sophomore at the Bronx H.S. of Science is undergoing major depression due to the prospect of his parent's potential incarceration.
- c) Letters to Your Honor from many family members and friends attesting to the Duh's earned respect and reputation, and the affection they enjoy in their community who has in the past always recognized this couple as otherwise exemplary individuals.

We thank the court for its full and just consideration.

Respectfully submitted,

s/ S. Michael Musa-Obregon

S. MICHAEL MUSA-OBREGON, ESQ.

S/ Telesforo Del Valle, Jr.

TELESFORO EL VALLE JR., ESQ.

cc: AUSA Glen Garrett McGorty
Mr. Tony Duh and Mrs. Tony Duh
All parties by ECF
encl.